

**EXHIBIT 32**  
**FILED UNDER SEAL**

1 UNITED STATES DISTRICT COURT

2 EASTERN DISTRICT OF TEXAS

3 SHERMAN DIVISION

4  
5 STATE OF TEXAS, et al., )

6 Plaintiffs, )

7 vs. ) Case No. 4:20-cv-00957-SDJ

8 GOOGLE, LLC )

9 Defendant. )

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11 REMOTE VIDEOTAPED DEPOSITION OF [REDACTED]

12 FRIDAY, APRIL 26, 2024

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15 Remote videotaped deposition of [REDACTED]

16 [REDACTED] held remotely at the location of the  
17 witness, commencing at approximately 10:06 a.m.,  
18 Eastern Standard Time, on the above date, before  
19 Juliana F. Zajicek, Registered Professional Reporter,  
20 Certified Shorthand Reporter and Certified Realtime  
21 Reporter.

22  
23  
24 Job No. MDLG6673031

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Page 4

I N D E X

WITNESS:

PAGE:

EXAM BY MS. YOUNG..... 7

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E X H I B I T S

EXHIBIT MARKED FOR ID

Exh 240 [REDACTED] 12

Exh 241 Google Chat, 11/29/2017; 75  
GOOG-DOJ-15675958 - 982

Exh 242 Google Chat, 5/18/2022; 80  
GOOG-AT-MDL-B-007353212 - 216

Exh 243 Google Chat, 9/24/2019; 111  
GOOG-AT-MDL-B-007497842 - 847

Exh 244 [REDACTED] 120

Exh 245 Google Chat, 2/24/2023; 141  
GOOG-AT-MDL-009480562 - 566

Exh 246 E-mail chain dated 9/20/2019; 153  
GOOG-DOJ-27775962 - 964

Exh 247 E-mail dated 3/8/23; 173  
GOOG-AT-MDL-014123315

Exh 248 E-mail dated 2/3/23; 186  
GOOG-AT-MDL-008582787 - 792

Exh 249 E-mail chain dated 3/24/2017; 201  
GOOG-AT-MDL-B-007645218 - 223

E X H I B I T S

EXHIBIT MARKED FOR ID

Exh 250 Metadata slip sheet and document 212  
titled "[REDACTED]  
[REDACTED]n";  
GOOG-AT-MDL-B-007463233 - 238

Exh 251 E-mail chain dated 7/27/16 from 237  
[REDACTED];  
GOOG-NE-11796089 - 695

Exh 252 E-mail chain dated 7/27/2016; 248  
GOOG-NE-12790631 - 635

Exh 253 E-mail chain dated 4/5/2017; 254  
GOOG-AT-MDL-B-007645382 - 384

Exh 254 E-mail dated 3/1/2019; 261  
GOOG-AT-MDL-B-006327627

Exh 255 Metadata slip sheet with document 277  
titled, "Ads Q4 2021 Earnings,  
One-Pager";  
GOOG-AT-MDL-B-007674405- 410

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Page 75

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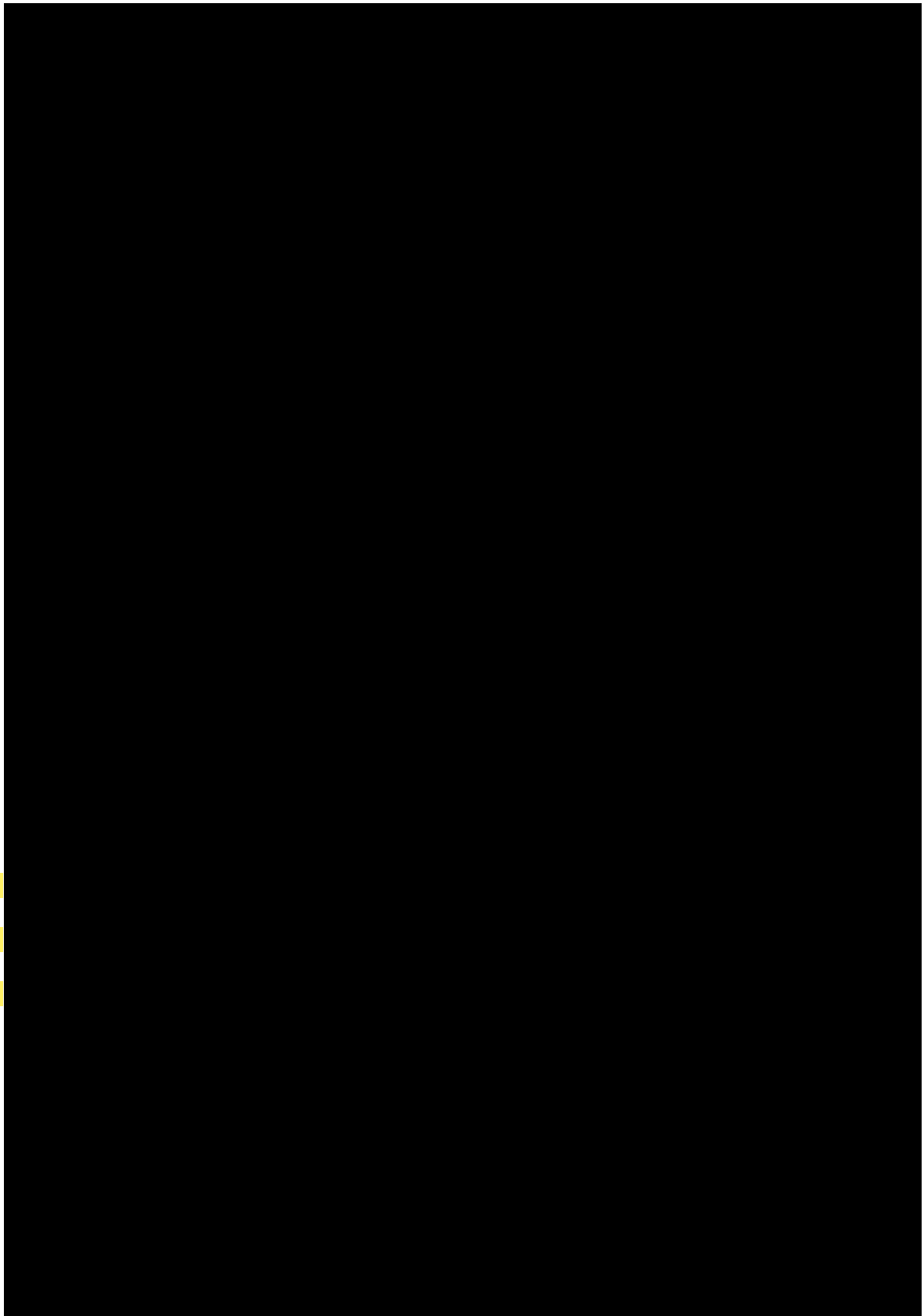
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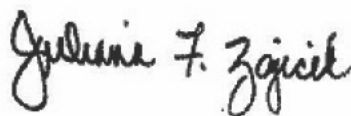
REPORTER'S CERTIFICATE

I, JULIANA F. ZAJICEK, a Registered Professional Reporter and Certified Shorthand Reporter, do hereby certify that prior to the commencement of the examination of the witness herein, the witness was duly remotely sworn by me to testify to the truth, the whole truth and nothing but the truth.

I DO FURTHER CERTIFY that the foregoing is a verbatim transcript of the testimony as taken stenographically by me at the time, place and on the date hereinbefore set forth, to the best of my availability.

I DO FURTHER CERTIFY that I am neither a relative nor employee nor attorney nor counsel of any of the parties to this action, and that I am neither a relative nor employee of such attorney or counsel, and that I am not interested directly or indirectly in the outcome of this action.

IN WITNESS WHEREOF, I do hereunto set my hand on this 29th day of April, 2024.



JULIANA F. ZAJICEK, Certified Reporter